Equality Impact Assessment [version 2.9]



Title: 2022/23 HRA Budget Proposal.	
☐ Policy ☒ Strategy ☐ Function ☐ Service	☐ New
☐ Other [please state]	☑ Already exists / review ☐ Changing
Directorate: Housing and Landlord Services	Lead Officer name: Sarah Spicer
Service Area: Business Innovation	Lead Officer role: Business Innovation – Head
	of Service

Step 1: What do we want to do?

The purpose of an Equality Impact Assessment is to assist decision makers in understanding the impact of proposals as part of their duties under the Equality Act 2010. Detailed guidance to support completion can be found here Equality Impact Assessments (EqIA) (sharepoint.com).

This assessment should be started at the beginning of the process by someone with a good knowledge of the proposal and service area, and sufficient influence over the proposal. It is good practice to take a team approach to completing the equality impact assessment. Please contact the <u>Equality and Inclusion Team</u> early for advice and feedback.

1.1 What are the aims and objectives/purpose of this proposal?

Briefly explain the purpose of the proposal and why it is needed. Describe who it is aimed at and the intended aims / outcomes. Where known also summarise the key actions you plan to undertake. Please use <u>plain English</u>, avoiding jargon and acronyms. Equality Impact Assessments are viewed by a wide range of people including decision-makers and the wider public.

Objective

To support the recommendations/proposals for:

- The 30yr HRA Business Plan
- The 2022/23 Housing Revenue Account (HRA) budget
- The 2022/23 Housing Investment Plan
- The 2022/23 Housing Delivery Programme
- Increasing the supply of affordable homes
- The procurement of relevant contractors to support delivery of these programmes, and delegate the authority to the Executive Director of Growth and Regeneration to appoint relevant contractors

Background to the Proposal

Housing and Landlord Services (H&LS) 30 year Business Plan and Budget focusses on:

- repairing, maintaining and improving the existing BCC council housing stock;
- providing services for council tenants and leaseholders;
- and increasing the provision of new affordable homes

The HRA operates in a difficult housing market and environment. Housing costs are high as are levels of homelessness and rough sleeping; the council has an aging stock with high levels of investment need; and many tenants struggle to maintain their tenancies and access the support they require.

There are city ambitions for housing, that include increasing the supply of affordable housing and tackling the climate emergency and reducing carbon emissions.

The main source of HRA income is the rent and service paid by council tenants and leaseholders. For four years rents decreased by 1% per year (2016-202), in line with Government policy. This significantly reduced expected income levels and resulted in cuts in levels of expenditure.

From 2020 there was a new rent standard that will allow social landlords to increase rent levels by up to CPI +1%.

This year extensive consultation was carried out with stakeholders to shape the Business Plan and Budget (Big Housing Conversation: Investing in Council Homes). A consultation report will accompany the 4 reports. Stakeholders were members, residents and leaseholders, Bristol citizens and organisations.

Consultation was focussed on how to balance competing priorities for future investment, which included three areas of focus: building new homes, energy efficiency and carbon retrofitting and improving standards in existing homes. The consultation made it clear that in order to invest more we need to generate more income through borrowing and rent increases.

1.2 Who will the proposal have the potential to affect?

☐ Bristol City Council workforce	⊠ Service users	
		ceholder organisations
The proposal will affect everyone from residents as it will affect the service they receive, the workforce		
responsible for delivering the service, the wider community who are dependent on accessing council housing		

responsible for delivering the service, the wider community who are dependent on accessing council housing when needed and other partners who provide additional supporting services or who are contracted to deliver a service on behalf of Housing & Landlord Services

1.3 Will the proposal have an equality impact?

Could the proposal affect access levels of representation or participation in a service, or does it have the potential to change e.g. quality of life: health, education, or standard of living etc.?

If 'No' explain why you are sure there will be no equality impact, then skip steps 2-4 and request review by Equality and Inclusion Team.

If 'Yes' complete the rest of this assessment, or if you plan to complete the assessment at a later stage please state this clearly here and request review by the Equality and Inclusion Team.

$oxed{oxed}$ Yes $oxed{oxed}$ No [please select]
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Impact

The key principles for the 2022/23 budget and longer-term business plan are:

- Rents and service charges increase by 4.1%, which is 1% increase above inflation.
- Repair & Investment of existing homes: Continue to ensure our homes are decent; warm, weathertight, modern and safe remain key priorities.
- New priorities identified to improve standards in individual homes, communal areas, blocks and estates. Including:
 - Energy efficiency and reducing carbon emissions: additional £80m to make homes more energy efficient and to reduce carbon emissions. This will enable us to ensure all homes reach a minimum EPC of C by 2030.
 - Bathroom modernisation programme: £19m to commence a five-year bathroom replacement programme that will deliver over 8500 modern new bathrooms in council homes by 2027.
 - Investing in communal areas, blocks, and estates: add £1m to the 2022/23 budget, and £10m over 5-years, to improve standards in communal areas, blocks and estates. Further work will be undertaken to determine how best to utilise this.

- For 2022/23 up to £350k will be made available for council tenants in financial crisis, with applications managed through the council's Local Housing Crisis Prevention fund.
- New Homes: commitment to provide new affordable homes in order to meet housing need, and address homelessness and rough sleeping. This year the budget proposes an increase of 148 new homes within the HRA Housing Delivery Programme.

Procurement of Contractors

The report request approval for delegated authority to procure contractors as necessary to support the delivery of proposed expenditure (including the Housing Investment Plan and New Build & Acquisition programme). This is a positive impact for the council and our tenants, as this proposal aims to make the procurement of contractors more efficient, meaning work programmes can be started earlier without the need for further approvals which can add additional costs to the budget.

Step 2: What information do we have?

2.1 What data or evidence is there which tells us who is, or could be affected?

Please use this section to demonstrate an understanding of who could be affected by the proposal. Include general population data where appropriate, and information about people who will be affected with particular reference to protected and other relevant characteristics: https://www.bristol.gov.uk/people-communities/measuring-equalities-success.

Use one row for each evidence source and say which characteristic(s) it relates to. You can include a mix of qualitative and quantitative data e.g. from national or local research, available data or previous consultations and engagement activities.

Outline whether there is any over or under representation of equality groups within relevant services - don't forget to benchmark to the local population where appropriate. Links to available data and reports are here <u>Data, statistics</u> and intelligence (sharepoint.com). See also: <u>Bristol Open Data (Quality of Life, Census etc.)</u>; <u>Joint Strategic Needs Assessment (JSNA)</u>; <u>Ward Statistical Profiles.</u>

For workforce / management of change proposals you will need to look at the diversity of the affected teams using available evidence such as <u>HR Analytics: Power BI Reports (sharepoint.com)</u> which shows the diversity profile of council teams and service areas. Identify any over or under-representation compared with Bristol economically active citizens for different characteristics. Additional sources of useful workforce evidence include the <u>Employee</u> Staff Survey Report and Stress Risk Assessment Form

Data / Evidence Source	Summary of what this tells us
[Include a reference where known]	
Demographic of tenants: H&LS has 30,422 tenants living in 26,274 properties. It is estimated that in total H&LS houses over 60,000 people. In	The ethnicity of 92.3% of tenants is known, of those: 73.4% are White British (reduction from 77.2% in April 2017), 22.1% are of Black, Asian or Minority Ethnicity, of which the largest groups are Black Africans and African Somalis (5.3% and 4.4% respectively) and
addition, there are 2,276 leaseholders leasing 1,743 properties.	4.5% identify as White Other. A higher proportion of our tenants are female, 62.7%, than male, 37.3%.
	The age of 98.8% of tenants is known; of these the most common age bands are 45-54 year olds and 55-64 years who each make up 21.1% of our tenants. 23.8% of our tenants are aged over 65 and 2.1% under 25

30.2% of our tenants have told us that they have at least one type of disability. 13.0% of our tenants report a long-term illness, 12.9% suffer from mental or emotional distress and 11.6% of our tenants report mobility problems.

When compared to the Bristol population as a whole (The Population of Bristol 2021) the differences include:

- Older people, aged 65+, make up 13% of Bristol's population compared to 24% of BCC tenants
- Women make up 50% of Bristol's population compared to 63% of BCC tenants
- Non White British people make up 22% of Bristol's population compared to 26.5% of BCC tenants.

Rent Arrears: Overall, 22.7% of tenants have rent arrears over £250. This is slightly lower than last year.

27.8% of tenants from Black, Asian or Minority Ethnic backgrounds have rent arrears over £250, compared to 21.5% of White British tenants and 19.8% of White Other tenants.

24.1% of female tenants are in arrears over £250 compared to 20.2% of male tenants.

Younger tenants are at higher risk of arrears than older tenants. 39.5% of under 25's are in arrears over £250. 6.9% of tenants aged 65-74 are.

Tenants with a recorded disability are less likely to be in arrears with 16.6% of them having rent arrears over £250.

Tenants identifying as White British/White European were most likely to be satisfied that their rent represented value for money, giving an average score of 8.2 out of 10. Tenants identifying as Asian were least likely to be satisfied that their Rent provided value for money, giving an average score of 7.6 out of 10. (Source: Resident Satisfaction Survey 2019).

Response Repairs: In the year 1st November 2020- 31st October 2021 63,168 response repairs were completed after being requested by a tenant, an average of 2.1 per tenant. This is not necessarily a typical figure as lockdowns adversely impacted our responsive repair service during this time. Younger tenants were more likely to order repairs than middle-aged tenants, with 25-34 year olds making an average of 2.6 repair requests per tenant and over 65's receiving an average of 1.7 repairs per tenant.

Black and minority ethnic tenants (on average 2.7 repairs per tenant) were more likely to order repairs than White British tenants (on average 1.9 repairs per tenant) or White Other tenants (1.7 repairs per tenant).

Disabled tenants (2.2 repairs per tenant) were slightly more likely to request repairs than non-disabled tenants (2.0 repairs per tenant) The disability group with the most repair requests were visually impaired persons (2.5 repairs per tenant) The group least like to request repairs were those with hearing impairments (2.1 repairs per tenant).

Tenants identifying as Black or African were the most satisfied with how BCC deals with Repairs and Maintenance, giving an average score of 7.0 out of 10. Tenants identifying as mixed race were the least satisfied giving an average score of 6.5.

The group most satisfied with the overall quality of their home were White British tenants who gave an average score of 7.3 out of 10.

	Mixed ethnicity tenants were the least satisfied giving an average score of 6.8. (Source: Resident Survey 2019).
Additional comments:	

2.2 Do you currently monitor relevant activity by the following protected characteristics?

⊠ Age	□ Disability	☐ Gender Reassignment
☐ Marriage and Civil Partnership	☐ Pregnancy/Maternity	⊠ Race
☐ Religion or Belief	⊠ Sex	\square Sexual Orientation

2.3 Are there any gaps in the evidence base?

Where there are gaps in the evidence, or you don't have enough information about some equality groups, include an equality action to find out in section 4.2 below. This doesn't mean that you can't complete the assessment without the information, but you need to follow up the action and if necessary, review the assessment later. If you are unable to fill in the gaps, then state this clearly with a justification.

For workforce related proposals all relevant characteristics may not be included in HR diversity reporting (e.g. pregnancy/maternity). For smaller teams diversity data may be redacted. A high proportion of not known/not disclosed may require an action to address under-reporting.

There are some gaps in diversity data relating to customer satisfaction levels, but work is in hand to address this.

2.4 How have you involved communities and groups that could be affected?

You will nearly always need to involve and consult with internal and external stakeholders during your assessment. The extent of the engagement will depend on the nature of the proposal or change. This should usually include individuals and groups representing different relevant protected characteristics. Please include details of any completed engagement and consultation and how representative this had been of Bristol's diverse communities. See https://www.bristol.gov.uk/people-communities/equalities-groups.

Include the main findings of any engagement and consultation in Section 2.1 above.

If you are managing a workforce change process or restructure please refer to <u>Managing change or restructure</u> (<u>sharepoint.com</u>) for advice on consulting with employees etc. Relevant stakeholders for engagement about workforce changes may include e.g. staff-led groups and trades unions as well as affected staff.

From October 20 to December 3 2021 we launched a consultation open to all Bristol residents and council employees to seek their view on how to fund additional investments within a 30 year business plan, the first year of this plan informed the budget for 22/23.

The consultation was open for six weeks. We had responses from 1,471 people and approximately 60% were tenants in one of our properties. Participants could either use an online simulator tool which provided a realistic simulation of the budget decisions we need to make or take part in a survey that was available online, by telephone survey and by post. The consultation reached the following conclusions:

Section of the report	Key finding:
Simulator Responses	 All groups selected to add an increase to rents, but residents selected to increase this the least All groups selected to invest more in building new council homes, energy efficiency and improving blocks All groups selected to invest more on bathrooms than kitchens Investment options were more limited in the resident group because the amount of money raised through borrowing and rent increases was much lower

All respondents on average prioritised building new homes and energy efficiency above other investment priorities. The resident group chose to invest more in bathrooms than blocks and estates

- All respondents on average selected to have some rent and borrowing increases.
- Support for investment in existing homes was more pronounced in the resident group.

The responses and comments are helping us plan the budget for council homes for the next 30 years. They will be taken into consideration in developing final proposals by both Cabinet and Council Members when making their decision. The final decision on the HRA 30 year budget will be made at a full council meeting in February 2022.

A full breakdown of who took part and the results are provided in the end of consultation report.

In the future various methods will be used to communicate with our key stakeholders and involve them in our service transformation plans for 2020/21, some of which are listed below:

• Utilise existing groups set up to involve and engage with tenants (Service user groups, Local Housing Forums and Housing Management Board)

Further engagements / equality impact assessment on specific work activities including future policy changes and strategy development, Co-design of service improvements with tenants and leaseholders

2.5 How will engagement with stakeholders continue?

Explain how you will continue to engage with stakeholders throughout the course of planning and delivery. Please describe where more engagement and consultation is required and set out how you intend to undertake it. Include any targeted work to seek the views of under-represented groups. If you do not intend to undertake it, please set out your justification. You can ask the Equality and Inclusion Team for help in targeting particular groups.

We will create a communication plan, utilising accessible forms of communication, to advice tenants of the rent decision. We will continue to signpost and refer tenants for debt and financial support.

Step 3: Who might the proposal impact?

Analysis of impacts must be rigorous. Please demonstrate your analysis of any impacts of the proposal in this section, referring to evidence you have gathered above and the characteristics protected by the Equality Act 2010. Also include details of existing issues for particular groups that you are aware of and are seeking to address or mitigate through this proposal. See detailed guidance documents for advice on identifying potential impacts etc. Equality Impact Assessments (EqIA) (sharepoint.com)

3.1 Does the proposal have any potentially adverse impacts on people based on their protected or other relevant characteristics?

Consider sub-categories (different kinds of disability, ethnic background etc.) and how people with combined characteristics (e.g. young women) might have particular needs or experience particular kinds of disadvantage.

Where mitigations indicate a follow-on action, include this in the 'Action Plan' Section 4.2 below.

GENERAL COMMENTS (highlight any potential issues that might impact all or many groups)

There are no proposals to reduce housing management services or responsive repairs, planned maintenance or investment.

Analysis demonstrates that some groups disproportionately affected by rent arrears. With above inflationary rent increases proposed for this year it's important that we:

- Promote opportunities to apply for benefits and to sign post residents to support
- Monitor the impact of the rent increase and its impact of younger people and Black, Asian and Minority Ethnic communities and women.

Our Asset Management Strategy has an EQIA in place to mitigate against negative impacts in relation to our investment decisions. We complete EQIAs before procuring each of the major refurbishment projects, and when reviewing our standards and developing new approaches to investment to maximise positive impacts and mitigate against any potential adverse impacts.

	NOTICE .
PROTECTED CHARACTER	
Age: Young People	Does your analysis indicate a disproportionate impact? Yes $oxtimes$ No $oxtimes$
Potential impacts:	Rent Increase
Mitigations:	Monitor the impact of the rent increase. This group is also more likely to order repairs
	than the older generation, this proposal could benefit this equality group by improving
	the state of their dwelling. For 2022/23 up to £350k will be made available for council
	tenants in financial crisis, with applications managed through the council's Local
	Housing Crisis Prevention fund.
Age: Older People	Does your analysis indicate a disproportionate impact? Yes $oxtimes$ No $oxtimes$
Potential impacts:	Rent increase
	We know people in this age group may be receive a pension that should increase with
	the rate of inflation.
Mitigations:	Promote opportunities to apply for benefits and to sign post residents to support.
Disability	Does your analysis indicate a disproportionate impact? Yes $oxtimes$ No $oxtimes$
Potential impacts:	Monitor the impact of the rent increase. Partially sighted tenants are more likely to
	request repairs to their property. For 2022/23 up to £350k will be made available for
	council tenants in financial crisis, with applications managed through the council's Local
	Housing Crisis Prevention fund.
Mitigations:	This group is also more likely to order repairs, this proposal could benefit this equality
	group by improving the state of their dwelling.
Sex	Does your analysis indicate a disproportionate impact? Yes $oxtimes$ No $oxtimes$
Potential impacts:	Rent increase
	Women are more likely to be rent arrears - the impact of the rent increase.
Mitigations:	Promote opportunities to apply for benefits and to sign post residents to support, and
	staggered payments options. For 2022/23 up to £350k will be made available for council
	tenants in financial crisis, with applications managed through the council's Local
	Housing Crisis Prevention fund.
Sexual orientation	Does your analysis indicate a disproportionate impact? Yes $oxtimes$ No $oxtimes$
Potential impacts:	Rent increase
Mitigations:	Promote opportunities to apply for benefits and to sign post residents to support, and
	staggered payments options. For 2022/23 up to £350k will be made available for council
	tenants in financial crisis, with applications managed through the council's Local
	Housing Crisis Prevention fund.
Pregnancy / Maternity	Does your analysis indicate a disproportionate impact? Yes □ No ⊠
Potential impacts:	We do not have the data for the group however, we should be mindful that women
	may be on maternity leave a rent increase could adversely affect this group.
Mitigations:	Promote opportunities to apply for benefits and to sign post residents to support, and
	staggered payment options. For 2022/23 up to £350k will be made available for council
	tenants in financial crisis, with applications managed through the council's Local
	Housing Crisis Prevention fund.
Gender reassignment	Does your analysis indicate a disproportionate impact? Yes ☐ No ☒
Potential impacts:	We do not have the data for the group
Mitigations:	

Race	Does your analysis indicate a disproportionate impact? Yes $oxtimes$ No $oxtimes$
Potential impacts:	Rent Increase- Black, Asian and Minority Ethnic tenants are more likely to be rent arrears - the impact of the rent increase. Mixed race tenants are more likely not to be satisfied with the state of repair than other groups. This proposal could benefit this equality group.
Mitigations:	Promote opportunities to apply for benefits and to sign post residents to support, and staggered payment options.
Religion or Belief	Does your analysis indicate a disproportionate impact? Yes $oxtimes$ No $oxtimes$
Potential impacts:	We do not have the data for the group however we should be mindful that we have a high number of the Somali community who will be adversely affected by the rent increase.
Mitigations:	Promote opportunities to apply for benefits and to sign post residents to support, and staggered payment options. For 2022/23 up to £350k will be made available for council tenants in financial crisis, with applications managed through the council's Local Housing Crisis Prevention fund.
Marriage & civil partnership	Does your analysis indicate a disproportionate impact? Yes \square No \boxtimes
Potential impacts:	We do not have the data for the group however, some women may be pregnant and on maternity leave at this time and would therefore be affected by the rent increase.
Mitigations:	
OTHER RELEVANT CHA	RACTERISTICS
Socio-Economic (deprivation)	Does your analysis indicate a disproportionate impact? Yes $oxtimes$ No $oxtimes$
Potential impacts:	Women, some minority groups are more likely to be rent arrears - the impact of the rent increase.
Mitigations:	Promote opportunities to apply for benefits and to sign post residents to support, and staggered payments. For 2022/23 up to £350k will be made available for council tenants in financial crisis, with applications managed through the council's Local Housing Crisis Prevention fund.
Carers	Does your analysis indicate a disproportionate impact? Yes ☐ No ☒
Potential impacts:	
Mitigations:	
	dd additional rows below to detail the impact for other relevant groups as appropriate e.g.
Asylums and Refugees;	Looked after Children / Care Leavers; Homelessness]
Potential impacts:	
Mitigations:	

3.2 Does the proposal create any benefits for people based on their protected or other relevant characteristics?

Outline any potential benefits of the proposal and how they can be maximised. Identify how the proposal will support our <u>Public Sector Equality Duty</u> to:

- ✓ Eliminate unlawful discrimination for a protected group
- ✓ Advance equality of opportunity between people who share a protected characteristic and those who don't
- ✓ Foster good relations between people who share a protected characteristic and those who don't

This proposal does have some benefits for our tenants in the following ways:

- Repair & Investment: continue to focus on our priorities previously identified by tenants including
 providing warm and reducing fuel poverty, ensuring homes are safe and on key elements such as kitchens.
 This benefits older and disabled tenants for whom the cold may be a particular issue, and recognises that
 many of the protected characteristic groups are more likely to live below the poverty line.
- New Homes: Women, Black and minority ethnic people, and disabled households are overrepresented as both household seeking homelessness prevention advice and on the housing register. Addressing housing

- needs by providing more homes is therefore beneficial in addressing inequalities. In addition new homes bring in a new income stream, safeguarding future income and service provision for all tenants.
- Service provision: continue to focus on provision of low cost housing that supports tenants and focusses services on the most vulnerable whilst considering impacts on estates and neighbourhoods.
- Procurement of Contractors: The city council tendering process will assess potential contractors on a range of factors including how they bring social value and the level of customer care offered.

We are also mindful that because disabled, and Black, Asian and Minority ethnic communities are over represented in seeking homelessness prevention advice, on the housing register and particularly they are more likely to be in rent arrears this proposal may not be promoting equality of opportunity and therefore we need to ensure that outlined mitigations and actions plans are carried through.

There will be opportunities throughout 2022/23 to engage further with tenants to explore standards and opportunities to shape our longer term vision and priorities for utilising Housing Revenue Account income.

Step 4: Impact

4.1 How has the equality impact assessment informed or changed the proposal?

What are the main conclusions of this assessment? Use this section to provide an overview of your findings. This summary can be included in decision pathway reports etc.

If you have identified any significant negative impacts which cannot be mitigated, provide a justification showing how the proposal is proportionate, necessary, and appropriate despite this.

Summary of significant negative impacts and how they can be mitigated or justified:

For tenants who are in rent arrears this proposal will influence their current debt situation. We will be mindful that support should be put in place for those who have been identified as having existing arrears and help from appropriate services will be forthcoming.

Summary of positive impacts / opportunities to promote the Public Sector Equality Duty:

The equalities impact assessment has reinforced existing knowledge that service provision is not always able to respond flexibly and effectively to the different needs of groups with protected characteristics. Focussing on maximising income, improving services and increasing the provision of homes is a targeted approach to addressing inequalities.

4.2 Action Plan

Use this section to set out any actions you have identified to improve data, mitigate issues, or maximise opportunities etc. If an action is to meet the needs of a particular protected group please specify this.

Improvement / action required	Responsible Officer	Timescale
Maximise rental income to enable future improvements. Delivered	Fiona Lester	March 2023
through improving the service and implementation of new		
technology such as rent sense and voice scape. These will require		
a further EqiA.		
Identify homes that are poor performing (require high levels of	Gillian Durden	March 2023
future investment and/or have low levels of tenant satisfaction)		
and carry out option appraisal regarding their future.		
We do not have data for tenants with the following protected	Sarah Spicer	March 2023
characteristic: gender reassignment, pregnancy and maternity,		
religion & belief, sexual orientation and marriage and civil		
partnership. We will endeavour to collect this information for		
subsequent surveys to understand the demographics of our		
tenants.		

4.3 How will the impact of your proposal and actions be measured?

How will you know if you have been successful? Once the activity has been implemented this equality impact assessment should be periodically reviewed to make sure your changes have been effective your approach is still appropriate.

- Key Performance Indicators will be used to monitor the contractor's performance.
- Monitor the complaints and identify systemic failures
- Continue to collect asset intelligence, proactive surveys, identify urgent priorities, assess information and feed into investment plan to ensure we have good sound knowledge and data of our homes.
- Carry out ongoing equalities monitoring and impact assessments for specific projects.
- Levels of rent arrears, have they increased and for which equality group, and in relation to housing register demographics

Step 5: Review

The Equality and Inclusion Team need at least five working days to comment and feedback on your EqIA. EqIAs should only be marked as reviewed when they provide sufficient information for decision-makers on the equalities impact of the proposal. Please seek feedback and review from the <u>Equality and Inclusion Team</u> before requesting sign off from your Director¹.

Equality and Inclusion Team Review: Reviewed by the Equality and Inclusion Team	Director Sign-Off: Donald Graham, Director Housing and Landlord Services
Date: 6 January 2022	Date: 06/01/2022

¹ Review by the Equality and Inclusion Team confirms there is sufficient analysis for decision makers to consider the likely equality impacts at this stage. This is not an endorsement or approval of the proposal.